

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

THE TRUSTEES OF PURDUE  
UNIVERSITY,

Plaintiff,

v.

STMICROELECTRONICS N.V.,  
STMICROELECTRONICS  
INTERNATIONAL N.V., and  
STMICROELECTRONICS, INC,

Defendants.

CIVIL ACTION NO. 6:21-CV-00727-ADA

JURY TRIAL DEMANDED

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT**

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff The Trustees of Purdue University (“Purdue”) hereby moves the Court to enter default against Defendant STMicroelectronics International N.V. as follows:

1. Purdue filed its Original Complaint for Patent Infringement against Defendants STMicroelectronics N.V. and STMicroelectronics, Inc. on July 14, 2021. Dkt. 1.
2. On October 25, 2021, Purdue filed its First Amended Complaint, which added Defendant STMicroelectronics International N.V. as a named party. Dkt. 27.
3. The Court issued the Summons to Defendant STMicroelectronics International N.V. on October 27, 2021. Dkt. 29.
4. On October 28, 2021, Purdue filed a Motion for Leave to Effect Alternative Service, which Defendant STMicroelectronics International N.V. opposed on November 1, 2021, and the Court denied on November 18, 2021. *See* Dkts. 31, 35, 39 & 41.
5. On April 4, 2022, Defendant STMicroelectronics International N.V. was served with the Summons, Purdue’s Original Complaint with attached Exhibits A-D, and Purdue’s First Amended

Complaint with attached Exhibit C, including Dutch translations of the same, via the Hague Convention pursuant to Fed. R. Civ. P. 4(f) and 4(h)(2). *See* Dkt. 91.

6. Based on the date of service and pursuant to Fed. R. Civ. P. 12(a)(1)(A), Defendant STMicroelectronics International N.V. was obligated to respond to the First Amended Complaint by April 24, 2022.

7. As of the filing of this Motion for Entry of Default, Defendant STMicroelectronics International N.V. has not filed an answer or any other responsive pleading.

8. Given the foregoing facts, Defendant STMicroelectronics International N.V. stands in default. Therefore, Purdue respectfully asks the Court to direct the Clerk of the Court to enter default against Defendant STMicroelectronics International N.V. pursuant to Fed. R. Civ. P. 55(a).

Dated: May 24, 2022

Respectfully submitted,

By: /s/ Halima S. Ndai  
Mark D. Siegmund (SBN 24117055)  
Craig D. Cherry (SBN 240124190)  
**Steckler, Wayne, Cherry & Love PLLC**  
8416 Old McGregor Road  
Waco, Texas 76712  
Tel: (254) 651-3690  
Fax: (254) 651-3689  
mark@swclaw.com  
craig@swclaw.com

Alfonso G. Chan (SBN 24012408)  
Michael W. Shore (SBN 18294915)  
Halima Shukri Ndai (SBN 24105486)  
Raphael Chabaneix (SBN 24118352)  
**Shore Chan LLP**  
901 Main Street, Suite 3300  
Dallas, Texas 75202  
Telephone: (214) 593-9110  
Facsimile: (214) 593-9111  
achan@shorechan.com  
mshore@shorechan.com  
hndai@shorechan.com

rchabaneix@shorechan.com

***COUNSEL FOR PLAINTIFF***  
***THE TRUSTEES OF PURDUE UNIVERSITY***

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on May 24, 2022, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

*/s/ Halima S. Ndai* \_\_\_\_\_

Halima S. Ndai